

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CLERK'S OFFICE

NOV 24 2004 3:06

UNITED STATES OF AMERICA

V.

TAJH WHITE

\*  
\*  
\*  
\*  
\*

CRIMINAL DOCKET  
NO. 04 – 10314 (RCL)

**DEFENDANT TAJH WHITE'S  
MOTION FOR FUNDS FOR DETENTION HEARING TRANSCRIPT**

Now comes the defendant, Tajh White, in the above-captioned matter and respectfully move this Honorable Court, to grant him funds to obtain a transcript of the detention hearing proceedings held on November 23, 2004 before the Honorable Marianne B. Bowler.

As reason therefore the Defendant says that the preparation of the detention hearing transcript is essential to his lawyer's ability to adequately address the sentencing concerns posed in *United States v. Booker* and *United States v. Fanfan*, -- U.S. -- , 125 S.Ct. 738 (2005) and to assure him a competent defense with competent advice from his lawyer.

The Defendant further attaches an Affidavit from his lawyer in support of the motion

Respectfully submitted,

/S/ William M. White, Jr.  
WILLIAM M. WHITE, JR.  
BBO#: 546283  
Davis, Robinson & White, LLP  
1 Faneuil Hall Marketplace, 3<sup>rd</sup> Floor  
Boston, MA 02109  
(617) 723-7339

AFFIDAVIT OF COUNSEL IN SUPPORT OF  
DEFENDANT TAJH WHITE'S MOTION FOR FUNDS FOR TRANSCRIPT

I, William M. White, Jr., do hereby depose and say the following:

1. I represent the defendant, Tajh White, in the case of *United States v. Tajh White*, 04-10314 (RCL). The defendant was charged with violating 21 USC §§846, 841(a)(1) and 853 (forfeiture).
2. Defendant Tajh White is indigent as manifested by my appointment pursuant to the Criminal Justice Act.
3. On November 23, 2004, a detention hearing was held before the Honorable Marianne B. Bowler at which Special Jean Drouin testified. The testimony of the agent covered acts of the defendant during the course of the alleged drug conspiracy.
4. The defendant anticipates resolving his case pursuant to a Rule 11 guilty plea.
5. In light of recent issues addressed in the U.S. Supreme Court's decision in *United States v. Booker* and *United States v. Fanfan*, -- U.S. -- , 125 S.Ct. 738 (2005), the defendant believes the preparation of the detention hearing transcript will be essential to his preparation for sentencing.
6. Counsel needs the requested transcript to adequately prepare for sentencing.
7. Counsel cannot adequately prepare for sentencing without a transcript.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 21<sup>st</sup> DAY OF  
OCTOBER, 2005.

/s/ William M. White, Jr.  
WILLIAM M. WHITE, JR.